

1 SHARON L. ANDERSON (SBN 94814)
2 County Counsel
3 DYLAN RADKE (SBN 207757)
4 Deputy County Counsel
5 COUNTY OF CONTRA COSTA
6 651 Pine Street, Ninth Floor
7 Martinez, California 94553
8 Telephone: (925) 335-1800
9 Facsimile: (925) 335-1866
10 Electronic Mail: dylan.radke@cc.cccounty.us

11
12 Attorneys for Defendant
13 COUNTY OF CONTRA COSTA

14
15 JOHN L. BURRIS, ESQ., SBN 69888
16 BEN NISENBAUM, ESQ., SBN 222173
17 JAMES COOK ESQ., SBN 300212

18 **LAW OFFICES OF JOHN L. BURRIS**
19 Airport Corporate Centre
20 7677 Oakport Street, Suite 1120
21 Oakland, California 94621
22 Telephone: (510) 839-5200
23 Facsimile: (510) 839-3882
24 john.burris@johnburrislaw.com
25 bnisenbaum@hotmail.com
26 james.cook@johnburrislaw.com

27
28 Attorneys for Plaintiff
FELIPE HERNANDEZ

19
20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 FELIPE HERNANDEZ, an individual,

23 Plaintiff,

24 v.

25
26 COUNTY OF CONTRA COSTA, a
27 municipal corporation; and DOES 1-50,

28 . Case No.: 4:18-cv-00267-KAW

STIPULATION AND [PROPOSED]
ORDER GRANTING LEAVE TO FILE
FIRST AMENDED COMPLAINT AND
EXTENDING DATE TO FILE
RESPONSIVE PLEADINGS

1 inclusive,
2 Defendants.

3 Crtrm: 4, 3rd Floor
4 Judge: Hon. Kandis A. Westmore, Presiding
5 Date Action Filed: January 11, 2018
6 Trial Date: None Assigned

7
8 The parties, by and through their attorneys, have met and conferred regarding Plaintiff
9 Felipe Hernandez's ("Plaintiff") complaint and this Court's order extending date to file
10 responsive pleadings and continuing case management conference and related dates. On
11 March 30, 2018, the Court ordered Plaintiff to file an amended complaint by April 17, 2018.
12 The Court also continued the case management conference to July 10, 2018. However,
13 Plaintiff needs more time to complete the amended complaint. Based on the parties'
14 conversation, the parties agreed that additional time is needed for Plaintiff to file an amended
15 complaint. Based on the above the parties have agreed to stipulate to the following time
16 schedule:
17

- 18 (1) The parties stipulate that Plaintiff will file an amended complaint within
19 fourteen days after this Court grants the order to file it. The County's
20 responsive pleadings will be filed fourteen days after the amended complaint is
21 filed.
- 22 (2) The parties stipulate that the case management conference remain scheduled for
23 July 10, 2018.

24 In light of the current procedural posture, the parties believe good cause exists to
25 provide time for Plaintiff file an amended complaint, to extend time for the County to file
26 responsive pleadings.

27
28 DATED: May 18,
29 2018

SHARON L. ANDERSON
COUNTY COUNSEL

By: *Dylan Radke*
DYLAN RADKE
Deputy County Counsel
Attorneys for Defendant
COUNTY OF CONTRA COSTA

1
2
3 DATED: May 18, 2018
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JOHN L. BURRIS LAW OFFICES

By: James Cook

JAMES COOK
Attorney for Plaintiff
FELIPE HERNANDEZ

ORDER

There is good cause to allow Plaintiff to file an amended complaint within fourteen days after this Court grants the order to file it. The County's responsive pleadings will be filed fourteen days after the amended complaint is filed.

There is further good cause to keep the case management conference on schedule for July 10, 2018 at 1:30 P.M. before the honorable Kandis A. Westmore. The joint case management statement is due July 3, 2018. All associated dates, including the date for the parties to exchange initial disclosures, are likewise continued.

IT IS SO ORDERED.

DATED: 5/23/18

By: Kandis Westmore
HON. KANDIS A. WESTMORE
United States Magistrate Judge